

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, NY 10007

January 19, 2021

BY ECF

Honorable William H. Pauley III United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: *Morrison v. United States*, No. 17 Civ. 6779 (WHP)

Dear Judge Pauley:

This Office represents the United States in the above-captioned action. I write on behalf of the Government to respectfully request a two-week extension of the remaining expert discovery deadlines. The parties have completed fact discovery, but the Government requires additional time to produce its expert disclosures.

The current deadline for the Government's expert disclosures is January 22, 2021; expert discovery is set to conclude February 12, 2021; and a status conference is scheduled for February 19, 2021. The Government respectfully requests that the Government's expert disclosures be due February 5, 2021; expert discovery conclude February 26, 2021; and that the status conference be rescheduled for a date in March 2021 at the Court's convenience.

Plaintiff consents to this request. This is the Government's first request for an extension of expert discovery deadlines (except as attendant to fact discovery extensions).

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I thank the Court for its consideration of this request.

Respectfully,

AUDREY STRAUSS United States Attorney Southern District of New York

By: <u>/s/ Lucas Issacharoff</u>

Lucas Issacharoff
Assistant United States Attorneys
86 Chambers Street, Third Floor
New York, New York 10007
Tel: (212) 637-2737/2746

Email: Lucas.Issacharoff@usdoj.gov

Cc: Counsel of Record via ECF